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[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CHRISTOPHER ARBOUR, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

TINGO GROUP, INC. F/K/A MICT, INC.,
DOZY MMOBUOSI, DARREN MERCER,
and KEVIN CHEN,

Defendants.

Case No. 2:23-cv-03151-ES-MAH

Hon. Esther Salas

CLASS ACTION

NOTICE OF LEAD PLAINTIFFS' VOLUNTARY DISMISSAL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:

WHEREAS, on June 8, 2023, the above-captioned securities fraud class action was filed asserting claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. § 78j(b) and 78t(a), and SEC Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5 (ECF No. 1);

WHEREAS, by Order dated February 14, 2024, the Court appointed Perdeep Kanda and Pavel Krykhtin as Lead Plaintiffs (hereinafter, “Lead Plaintiffs”), and approved Lead Plaintiffs’ selection of Saxena White P.A. as Lead Counsel and Carella, Byrne, Cecchi, Brody & Agnello, P.C. as Liaison Counsel for the putative class (ECF No. 51);

WHEREAS, by Order dated August 21, 2024, the Court ordered that Lead Plaintiffs file their Amended Consolidated Class Action Complaint (the “Amended Complaint,”) by September 20, 2024, and that defendants file any answer or otherwise respond to the Amended Complaint by November 4, 2024 (ECF No. 72);

WHEREAS, on September 20, 2024, Lead Plaintiffs filed their Amended Complaint (ECF No. 73);

WHEREAS, on October 17, 2024, the Court granted Defendant Darren Mercer’s request that the deadline to answer or otherwise respond to the Amended Complaint be extended from November 4, 2024 to December 4, 2024 (ECF No. 75);

WHEREAS, on November 26, 2024, the Court granted Defendant Darren Mercer's request that the deadline to answer or otherwise respond to the Amended Complaint be extended from December 4, 2024 to February 7, 2024 (ECF No. 77);

WHEREAS, a class has not been certified in this action, and no defendant in this action has served an answer or motion for summary judgment.

NOTICE IS HEREBY GIVEN that, pursuant to Federal Rule of Civil Procedure 41(a)(1), Lead Plaintiffs hereby voluntarily dismiss the above-captioned action, without prejudice, as to all defendants.

Dated: December 18, 2024

Respectfully submitted,

**CARELLA, BYRNE, CECCHI, BRODY
& AGNELLO, P.C.**

By: /s/ James E. Cecchi

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Additional Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 17, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/ James E. Cecchi
James E. Cecchi